

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-v-

02-CR-73-A(1),(5),(9),(15)

MARK CONGI,  
ALBERT CELESTE,  
PAUL BELLRENG,  
JOEL CICERO,

Defendants.

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**GOVERNMENT'S SUPPLEMENTAL WITNESS LIST**

The United States of America, by and through its attorneys, Terrance P. Flynn, United States Attorney for the Western District of New York, and William J. Hochul, Jr. and Brett A. Harvey, Assistant United States Attorneys, hereby supplies a supplemental list of its potential trial witnesses, together with a brief summary of anticipated testimony and approximate length of testimony, for the Government's case-in-chief.

**W3 - Anello, Vincenzo**

Anello, Mayor of the City of Niagara Falls, would testify that on or about December 27, 1999, he attended a meeting of the Niagara Falls City Council. At that time, Anello was a member of the Council. During the meeting, Anello spoke out against a contract between Local 91 and the City of Niagara Falls. Soon thereafter,

Anello noticed that three of the four tires on his vehicle were punctured, and that the hood, tailgate, and both sides of the vehicle were scratched, causing extensive damage. Expected length of testimony is ten minutes.

**W306 - Accardo, John**

Accardo, a former Niagara Falls City Councilman, will testify that, after a Council meeting in early 1998, the four tires on his vehicle were punctured, and the body of the vehicle was scratched, causing extensive damage. Expected length of testimony is ten minutes.

**W320 - Bradford, John**

Owner and operator of Rusmar Environmental, which is a non-union, asbestos abatement company. Bradford will testify that a Local 91 representative demanded that he hire Local 91 laborers for a job at the Middleport School in the Summer of 1997. In addition, Bradford will testify that, after refusing to hire Local 91 workers, negative air machines used by Rusmar at the Middleport School job were damaged, and some ladders and airless sprayers were missing. Expect length of testimony is ten minutes.

**W327 - Cox, Gregory**

FBI Special Agent Gregory Cox will testify that he conducted a photographic array with Tim Maerten on May 10, 2006, at which time Maerten positively identified defendant PAUL BELLRENG. Expected length of testimony is ten minutes.

DATED: Buffalo, New York, July 12, 2006.

Respectfully submitted,

TERRANCE P. FLYNN  
United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2006, I electronically filed the foregoing **Government's Supplemental Witness List** with the Clerk of the District Court using its CM/ECF system which would then electronically notify the following CM/ECF participant(s) on this case:

Joel L. Daniels, Esq.

Terrence M. Connors, Esq.

John J. Molloy, Esq.

I hereby certify that on July 12, 2006, I mailed the foregoing **Government's Supplemental Witness List**, by the United States Postal Service, to the following non-CM/ECF participant(s):

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Buffalo, New York 14203

s/Karen A. Brown  
KAREN A. BROWN